

George Haines, Esq.
Nevada Bar No. 9411
Gerardo Avalos, Esq.
Nevada Bar No. 15171
FREEDOM LAW FIRM
8985 S. Eastern Ave, Suite 100
Las Vegas, Nevada 89123
(702) 880-5554
(702) 385-5518 (fax)
Ghaines@freedomlegalteam.com
Counsel for Plaintiff Heather Laboriante

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

Heather Laboriante

Plaintiff,

v.

Trans Union, LLC and Clarity Services, Inc.,

Defendants.

Case No.: 2:23-cv-00747-APG-VCF

**Unopposed Motion for Extension of
Time for Trans Union to Answer**

(First Request)

Heather Laboriante (“Plaintiff”), hereby files his Unopposed Motion for Extension of Time for Trans Union to Answer (“Motion”) and in support states:

1. On May 15, 2023, Trans Union was served with Plaintiff’s Complaint for Damages under the FCRA, 15 U.S.C. § 1681 (“Complaint”).
2. Accordingly, Trans Union’s responsive pleading to the Complaint is due on June 5, 2023.
3. Plaintiff and Trans Union are actively engaged in case-resolution negotiations.
4. Plaintiff does not oppose an extension of Trans Union’s time to respond to the Complaint so that the parties may devote their energies to resolving this matter, and respectfully requests the Court for an extension of time for Trans Union to file its responsive pleading by 30 days, which is up to and including **July 5, 2023**.
5. This motion is filed in good faith and not for delay.
6. This is the first request for an extension of time for Trans Union to answer the complaint and the requested extension does not prejudice the parties.

1 7. For the foregoing reasons, Plaintiff requests that the Court issue an order extending the date
2 by which Trans Union must answer or otherwise respond to Plaintiff's Complaint to **July 5,**
3 **2023.**

4 DATED June 5, 2023.

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6 **FREEDOM LAW FIRM**

7 /s/ Gerardo Avalos

8 George Haines, Esq.

9 Gerardo Avalos, Esq.

8985 S. Eastern Ave., Suite 100

Las Vegas, NV 89123

Counsel for Plaintiff

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13 **GOOD CAUSE SHOWN, IT IS SO ORDERED.**

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15 Dated 6-5-2023

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17 UNITED STATES MAGISTRATE JUDGE